

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

SKYTEC, INC.,

Plaintiff-Counterdefendant,  
v.

LOGISTIC SYSTEMS, INC.,

Defendant-Counterclaimant.

No. 3:15-CV-02104-BJM

The Honorable Bruce J. McGiverin

**DEFENDANT'S MOTION TO RESTRICT**

TO THE HONORABLE COURT:

COMES NOW Defendant-Counterclaimant Logistic Systems, Inc. ("LogiSYS"), by and through its undersigned counsel, and hereby respectfully request as follows:

1. On this same date, LogiSYS is filing Defendant's Motion Regarding its Proof of Damages and for Prevailing Party Attorney and Expert Fees and Expenses.
2. The request contained in LogiSYS's motion is supported by declarations of Mr. Charlie Stortz, Sam Bull, Esq., and Carlos A. Rodríguez Vidal, Esq. The Exhibits to the Declarations of Mr. Bull and Mr. Rodríguez Vidal include invoices of the law firms of Foster Pepper and Goldman Antonetti & Córdova, LLC with detailed accounts of all of the work performed by the attorneys and paralegals at those law firms on behalf of LogiSYS in this case and the rates at which they performed such work. Perforce, such information, and the level of detail contained in them, is confidential, is covered by attorney/client and work product privileges and should not be disclosed to the public at large.
3. This motion requests that the Court allow LogiSYS to restrict access to Exhibit A to the Declarations of Sam Bull, Esq. and Carlos A. Rodríguez Vidal, Esq. to the parties in this litigation

and Court personnel. The information has been produced for examination by Alexis Fuentes, Esq., bankruptcy counsel for Skytec. No prejudice to the parties will be caused by allowing such restriction.

WHEREFORE, it is respectfully requested from this Honorable Court that it allow the filing of Exhibit A to the Samuel Bull, Esq. Declaration and the Carlos A. Rodríguez Vidal Declaration in the Selected Parties restriction level.

RESPECTFULLY SUBMITTED this 10th day of December, 2018.

*s/ Carlos A. Rodríguez-Vidal*

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*s/ Samuel T. Bull*

*s/ Lauren J. King*  
*s/ Kelly Mennemeier*  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certify that on December 10, 2018 the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF System which will send notification of such filing to all counsel of record.

Dated this 10th day of December, 2018 in San Juan, Puerto Rico.

*s/ Carlos A. Rodríguez-Vidal*

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